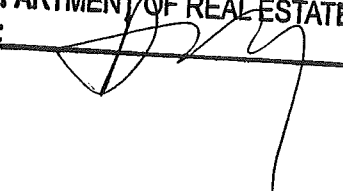


1 MARTHA J. ROSETT, Counsel (SBN 142072)  
2 Bureau of Real Estate  
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4 Los Angeles, CA 90013-1105

5 (213) 576-6982  
6 (213) 620-6430

**FILED**

FEB - 6 2014

DEPARTMENT OF REAL ESTATE  
BY: 

8 BEFORE THE BUREAU OF REAL ESTATE  
9 STATE OF CALIFORNIA

10 \* \* \* \*

11 In the Matter of the Accusation of )  
12 ) No. H-39299 LA  
13 ANGEL WAYHANG KOU, ) A C C U S A T I O N  
14 )  
15 Respondent. )

16 The Complainant, Maria Suarez, a Deputy Real Estate Commissioner of the State  
17 of California, for cause of Accusation against ANGEL WAYHANG KOU ("Respondent"), is  
18 informed and alleges as follows:

19 1.

20 The Complainant, Maria Suarez, a Deputy Real Estate Commissioner of the State  
21 of California, makes this Accusation in her official capacity.

22 2.

23 At all times herein mentioned, Respondent was and still is licensed and/or has  
24 license rights under the Real Estate Law (Part 1 of Division 4 of the Business and Professions  
25 Code) as a real estate salesperson. Respondent was first licensed as a salesperson on or about  
26 July 27, 2006.

1 3.

2 On or about April 3, 2012, in the Superior Court of California, County of San  
3 Bernardino, in Case No. FVA801520, Respondent was convicted of violating Penal Code  
4 Section 498(b) (theft of utilities), a felony and crime which is substantially related to the  
5 qualifications, functions and duties of a real estate licensee. Respondent was placed on three  
6 years formal probation.

7 4.

8 Respondent's conviction constitutes cause for the revocation or suspension of  
9 Respondent's license and license rights pursuant to Business and Professions Code Sections 490  
10 and/or 10177(b).

11 6.

12 Business and Professions Code Section 10106 provides, in pertinent part, that in  
13 any order issued in resolution of a disciplinary proceeding before the Department, the  
14 commissioner may request the administrative law judge to direct a licensee found to have  
15 committed a violation of this part to pay a sum not to exceed the reasonable costs of the  
16 investigation and enforcement of the case.

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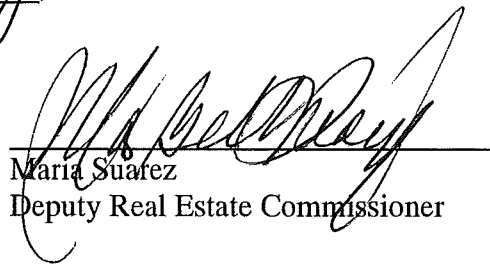
27 ///

1                   WHEREFORE, the Complainant prays that a hearing be conducted on the  
2 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing  
3 disciplinary action against all licenses and/or license rights of Respondent, ANGEL WAYHANG  
4 KOU, for the cost of investigation and enforcement as permitted by law, and for such other and  
5 further relief as may be proper under other provisions of law.

6 and for such other and further relief as may be proper under applicable provisions of law.

7 Dated at Los Angeles, California

8 this 5<sup>th</sup> day of February, 2014.

9  
10  
11   
12 Maria Suarez  
13 Deputy Real Estate Commissioner  
14  
15  
16  
17  
18  
19  
20  
21

22 cc:     Angel Wayhang Kou  
23         Empire Estates, Inc./Brock Eldon Whobrey  
24         Sacto.  
25         Maria Suarez  
26  
27